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January 25, 2022

**VIA ECF**

**Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
James T. Foley U.S. Courthouse  
40 Foley Square  
New York, New York 10007**

**Re: Taylor v. Moisa-Babii, et al., 1:21-cv-09253-RA**

**Dear Judge Abrams:**

This office represents Plaintiff, Tahjanae Taylor, in the above-referenced matter. The complaint was filed on 11/9/21 and service on defendants Dr. Director, Dr. Moisa-Babii, Lenox Hill Hospital, Northwell Health was effectuated by 1/21/22. Plaintiff is in the process of effecting service on Dr. Park and intends to complete service in accordance with Fed. R. Civ. P. 4(m).

Considering this timeline, we have conferred with counsel appearing on behalf of the aforementioned Defendants, and are jointly requesting a 60-day adjournment of the Initial Conference, currently scheduled for 2/11/22, as well as a 60-day extension of the 2/4/22 deadline to submit a proposed case management plan and scheduling order.

The amount of time requested is still less than the 90-days scheduled for these deadlines as initially scheduled by this Court for following the commencement of this action. Moreover, it is respectfully submitted that the extension requested herein will allow service to be completed on the remaining Defendant, as well as time for all Defendants to respond to the complaint and for the parties to engage meaningfully in case management discussions.

As such, we respectfully request that the deadline for submitting the case management and scheduling order be extended to 4/5/22 and propose the following alternative dates for the initial conference: 4/12/22, 4/13/22, 4/14/22, or 4/15/22, or any date thereafter that works for the Court. Of course, we will proceed in any manner this Honorable Court directs with respect to the above requests.

We thank the Court for its attention to this matter.

Sincerely,



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Application granted.

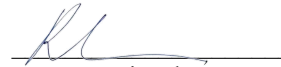
cc (via ECF):

Lauren J. Daniels  
Shaub, Ahmuty, Citrin & Spratt, LLP  
*Attorney for Defendants*  
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The conference scheduled for February 11, 2022 is adjourned to April 15, 2022 at 2:45 p.m. This conference will be held via telephone. The parties shall use the following dial-in information to call in to the conference: Call-in Number: (888) 363-4749; Access Code: 1015508. This conference line is open to the public.

The parties shall submit their joint letter and proposed case management plan by April 8, 2022.

SO ORDERED.



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Hon. Ronnie Abrams  
01/26/22